BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the Matter of	)	
	)	EB Docket No. 04-296
Review of the Emergency Alert System	)	

REPLY COMMENTS OF 3G AMERICAS

3G Americas, LLC ("3G Americas") represents manufacturers and service providers with an interest in the GSM family of wireless technologies[1] in the Americas. Its primary mission is to promote the evolution to, and seamless deployment of, third generation wireless technology throughout the Americas.

3G Americas supports the Commission's efforts to improve the nation's Emergency Alert System ("EAS"), and believes that mobile wireless telephone networks have the potential to play an important part in an EAS that capitalizes on the country's advanced communications infrastructure. Indeed, 3G Americas has already begun studies to investigate how this might be accomplished. However, mobile wireless technologies are fundamentally different than the broadcast technologies that now carry EAS notifications. These differences mean that many significant technical and policy issues must be resolved before mobile wireless networks can be effectively integrated into an expanded EAS. 3G Americas believes that the best way to tackle these issues is to create a mechanism – akin perhaps to a WRC advisory committee or to the model that was used for the deployment of the Wireless Priority Service – where industry and government representatives can work together to craft an appropriate approach to the

[1] GSM, GPRS, EDGE, UMTS, and HSDPA.

complex issues arising from an effort to incorporate wireless networks as a component of the EAS.

I. THERE ARE TECHNICAL CHALLENGES TO INCLUDING MOBILE WIRELESS NETWORKS IN AN EXPANDED EAS

Needless to say, not all wireless services and technologies are alike. And mobile wireless networks are about as different from broadcast networks as two wireless services can be. Thus very little of the learning associated with the current EAS is transferable to mobile wireless networks.

Several technical challenges must be overcome before mobile wireless networks can complement radio and television as part of an expanded EAS. 3G Americas and its members are committed to developing solutions to these challenges and have already undertaken studies to develop possible solutions. These studies make clear, however, that coming up with the right answers will take time, effort, and clear thinking.

Some have suggested incorporating a second radio device into mobile handsets to receive EAS notifications. 3G Americas's initial studies, however, indicate that this is not a feasible option. First, doing so will require replacing the hundreds of millions of handsets currently in operation. Second, adding another radio device will mean that these new handsets will be bigger, bulkier, and heavier than the handsets they replace. Third, the added radio components will drain handset batteries faster, resulting in poorer handset performance. This leads 3G Americas to believe that a better solution will be for mobile wireless networks to provide EAS notifications using the frequencies and technologies (with any necessary adaptations) already available to wireless carriers.

Short-Message Service ("SMS") is one currently deployed technology that has also been mentioned as a possible tool for EAS notifications. While a solid and

successful commercial technology, SMS appears to offer limited potential for such expansive EAS purposes. SMS uses relatively scarce radio network resources and therefore does not have the capacity to deliver emergency notifications on a large scale within any acceptable timeframe. Furthermore, without enhancement, SMS technology is not capable of delivering messages to recipients identified geographically, which limits its usefulness for the typical case where an emergency is localized. Moreover, because of the way SMS networking is configured, even if wireless networks developed the capability to target emergency messages to those who reside in the affected area, visitors to the affected area would not get geographically appropriate warnings. These limitations mean that, while SMS and related technologies might eventually be useful for some small-scale emergency notifications, they are unlikely to offer a complete large-scale EAS solution.

This does not mean there are no potential solutions. The initial studies undertaken by 3G Americas suggest that cellular broadcast technologies, such as Cell Broadcast or Multimedia Broadcast/Multicast Service, may be an avenue for mobile networks to participate in the EAS. But it will take both time and an appreciation of the structure of mobile networks to craft an appropriate role for those networks in the EAS.

II. POLICYMAKERS MUST ASSIST NETWORK OPERATORS IN MANAGING THE COST AND RISK OF PARTICIPATING IN THE EAS

Even in the best of circumstances, incorporating mobile wireless networks into an expanded EAS will be an expensive and time-consuming process. Networks are likely to require extensive reworking – and given the number and ubiquity of wireless networks this cannot happen overnight and cannot happen without incurring substantial costs, even after the technology challenges are overcome.

Whatever role mobile networks do eventually play in an expanded EAS, policymakers will need to provide a cost-recovery mechanism for EAS expenses. First and foremost, such expenses will include both the development and deployment of this new functionality. Recovery of these costs is necessary to ensure that all mobile wireless providers, large and small, are able to deploy EAS functionality. But there must also be a mechanism for recovering the costs of the messages delivered. EAS notifications have the potential for consuming enormous network resources – mostly at the behest of state and local entities. Network operators, who historically have had the choice of whether to participate in delivery of non-national messages, should be able to recover the costs of providing those messages.

Another challenge for policymakers will be to craft appropriate liability rules for mobile wireless networks. While mobile wireless networks are very reliable, they are not absolutely reliable, nor were they designed to be. Moreover, the delivery of EAS notifications is likely to trigger enormous network usage (and perhaps overload). Liability rules should reflect this reality and mobile wireless network providers should not be liable for a failure to deliver messages, delays in delivering messages, or for garbled or otherwise imperfect delivery.

CONCLUSION

Mobile wireless networks have real potential to be a component of an expanded Emergency Alert System. But technical and policy issues must be addressed before mobile wireless networks can play such a role. 3G Americas believes that these obstacles can be overcome efficiently and expeditiously only if the Commission develops an appropriate forum for government and industry work together to craft an appropriate role for mobile wireless networks. 3G Americas stands ready to participate in such a forum.

Respectfully Submitted,

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